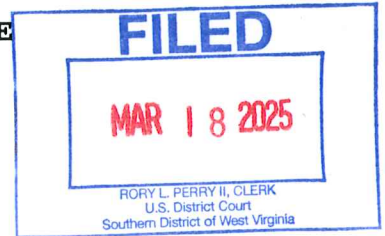


UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON GRAND JURY 2024
MARCH 18, 2025 SESSION



UNITED STATES OF AMERICA

v.

CRIMINAL NO.

2:25-cr-00039

21 U.S.C. § 841(a) (1)

18 U.S.C. § 922(g) (1)

18 U.S.C. § 924(a) (8)

GARY W. JACKSON

I N D I C T M E N T

The Grand Jury Charges:

COUNT ONE

On or about August 9, 2023, at or near Charleston, Kanawha County, West Virginia, and within the Southern District of West Virginia, defendant GARY W. JACKSON knowingly and intentionally distributed a quantity of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, and a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, also known as "fentanyl," both Schedule II controlled substances.

In violation of Title 21, United States Code, Section 841(a) (1).

COUNT TWO

On or about December 6, 2023, at or near Charleston, Kanawha County, West Virginia, and within the Southern District of West Virginia, defendant GARY W. JACKSON knowingly and intentionally distributed 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE

On or about April 23, 2024, at or near Charleston, Kanawha County, West Virginia, and within the Southern District of West Virginia, defendant GARY W. JACKSON knowingly and intentionally distributed 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR

On or about May 15, 2024, at or near Charleston, Kanawha County, West Virginia, and within the Southern District of West Virginia, defendant GARY W. JACKSON knowingly and intentionally distributed 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIVE

1. On or about May 21, 2024, at or near Charleston, Kanawha County, West Virginia, and within the Southern District of West Virginia, defendant GARY W. JACKSON did knowingly possess the following firearms in and affecting interstate commerce:

- a. a CMMG Inc., Model MK-4, .300 caliber rifle; and,
- b. a Rossi, Model M68, .38 caliber revolver.

2. At the time defendant GARY W. JACKSON possessed the aforesaid firearms, he knew he had been convicted of the following crimes each of which was punishable by imprisonment for a term exceeding one year as defined in 18 U.S.C. § 921 (a)(20), that is:

- a. Convicted on or about October 16, 2015, in the Circuit Court of Putnam County, West Virginia, of the felony offense of Possession with intent to Deliver a controlled substance, to-wit: marihuana, in violation of W.Va. Code 60A-4-401(a); and
- b. Convicted on or about April 28, 2011, in the Circuit Court of Putnam County, West Virginia, of the felony offense of Attempt to Manufacture a Controlled Substance, to-wit: methamphetamine, in violation of W.Va. Code Sections 61-11-8 and 60A-4-401.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

FORFEITURE

The allegations contained in Counts One through Five of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d)(1), 21 U.S.C. § 853(a) and 28 U.S.C. § 2461(c).

Pursuant to 18 U.S.C. § 924(d)(1), 21 U.S.C. § 853(a), 28 U.S.C. § 2461(c), and Rule 32.2(a) of the Federal Rules of Criminal Procedure, and premised upon conviction of defendant GARY W. JACKSON of the offenses in violation of 21 U.S.C. § 841(a)(1), as charged in Count One through Four of this indictment, or 18 U.S.C. §§ 922(g)(1) and 924(g)(8), as charged in Count Five of this indictment, defendant GARY W. JACKSON shall forfeit to the United States of America, any property, real or personal, constituting, or derived from, any proceeds traceable to the violations charged herein, and any property involved in or used in the offenses, including but not limited to:

- a. a CMMG Inc., Model MK-4, .300 caliber rifle, SN: SCG005892;
- b. a Rossi, Model M68, .38 caliber revolver, SN: AA590278; and

c. any ammunition seized on or about May 21, 2024.

LISA G. JOHNSTON
Acting United States Attorney

By:



SAMUEL D. MARSH
Assistant United States Attorney